

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
FRANCHISE GROUP, INC., <i>et al.</i> , <sup>1</sup>	Case No. 24-12480 (JTD)
Debtors.	(Jointly Administered)

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE PURSUANT TO FED. R.  
BANKR. P. 2002**

**PLEASE TAKE NOTICE** that, pursuant to section 1109(b) of 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the law firms of Tayman Lane Chaverri LLP and Bayard, P.A. hereby enter their appearances as counsel for Kin Properties, Inc., Jefan LLC, Aberdeen Oklahoma Associates, Pasan LLC, Esan LLC, Fundamentals Company LLC, Muffrey LLC, Fundamentals Company, Kinpark Associates, Laurie Industries Inc., Alisan Trust, Diajeff Trust, Stowsan Limited

---

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of their U.S. federal tax identification numbers, to the extent applicable, are Franchise Group, Inc. (1876), Freedom VCM Holdings, LLC (1225), Freedom VCM Interco Holdings, Inc. (2436), Freedom Receivables II, LLC (4066), Freedom VCM Receivables, Inc. (0028), Freedom VCM Interco, Inc. (3661), Freedom VCM, Inc. (3091), Franchise Group New Holdco, LLC (0444), American Freight FFO, LLC (5743), Franchise Group Acquisition TM, LLC (3068), Franchise Group Intermediate Holdco, LLC (1587), Franchise Group Intermediate L, LLC (9486), Franchise Group Newco Intermediate AF, LLC (8288), American Freight Group, LLC (2066), American Freight Holdings, LLC (8271), American Freight, LLC (5940), American Freight Management Company, LLC (1215), Franchise Group Intermediate S, LLC (5408), Franchise Group Newco S, LLC (1814), American Freight Franchising, LLC (1353), Home & Appliance Outlet, LLC (n/a), American Freight Outlet Stores, LLC (9573), American Freight Franchisor, LLC (2123), Franchise Group Intermediate B, LLC (7836), Buddy’s Newco, LLC (5404), Buddy’s Franchising and Licensing LLC (9968), Franchise Group Intermediate V, LLC (5958), Franchise Group Newco V, LLC (9746), Franchise Group Intermediate BHF, LLC (8260); Franchise Group Newco BHF, LLC (4123); Valor Acquisition, LLC (3490), Vitamin Shoppe Industries LLC (3785), Vitamin Shoppe Global, LLC (1168), Vitamin Shoppe Mariner, LLC (6298), Vitamin Shoppe Procurement Services, LLC (8021), Vitamin Shoppe Franchising, LLC (8271), Vitamin Shoppe Florida, LLC (6590), Betancourt Sports Nutrition, LLC (0470), Franchise Group Intermediate PSP, LLC (5965), Franchise Group Newco PSP, LLC (2323), PSP Midco, LLC (6507), Pet Supplies “Plus”, LLC (5852), PSP Group, LLC (5944), PSP Service Newco, LLC (6414), WNW Franchising, LLC (9398), WNW Stores, LLC (n/a), PSP Stores, LLC (9049), PSP Franchising, LLC (4978), PSP Subco, LLC (6489), PSP Distribution, LLC (5242), Franchise Group Intermediate SL, LLC (2695), Franchise Group Newco SL, LLC (7697), and Educate, Inc. (5722). The Debtors’ headquarters is located at 109 Innovation Court, Suite J, Delaware, Ohio 43015.

Partnership, Esue LLC, Alisan LLC, and Roseff LLC (collectively, “Kin Properties”) in the above-captioned bankruptcy cases (collectively, the “Bankruptcy Cases”).

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Bankruptcy Rules 2002, 3017, and 9007, the undersigned requests that copies of all notices, pleadings, and all other papers required to be served in the Bankruptcy Cases be served upon the following persons, and that such persons be added to the mailing matrix in the Bankruptcy Cases:

<p>Jeffrey Rhodes, Esquire <b>Tayman Lane Chaverri LLP</b> 2001 L Street, NW, Suite 500 Washington, DC 20036 Telephone: (202) 921-4080 Facsimile: (202) 478-2781 Email: <a href="mailto:jrhodes@tlclawfirm.com">jrhodes@tlclawfirm.com</a></p>	<p>Ericka F. Johnson, Esquire <b>Bayard, P.A.</b> 600 N. Market Street, Suite 400 Wilmington, DE 19801 Telephone: (302) 655-5000 Facsimile: (302) 658-6395 Email: <a href="mailto:ejohnson@bayardlaw.com">ejohnson@bayardlaw.com</a></p>
--	--

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Bankruptcy Code sections 342 and 1109(b), the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules set forth above, but also includes, without limitation, any orders and notices of any application, complaint, demand, motion, petition, pleading, disclosure statement or plan of reorganization, or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, overnight, or hand delivery, telephone, telegraph, telex, or otherwise filed or made with regard to the Bankruptcy Cases and proceedings therein.

Neither this Notice of Appearance, nor any subsequent appearance, pleading, claim, or suit, is intended to waive: (a) the rights of Kin Properties to have final orders in (i) non-core matters, and (ii) matters designated for final adjudication in the Bankruptcy Court as a statutory matter pursuant to 28 U.S.C. § 157(b), but prohibited from proceeding as such pursuant to Article III of the Constitution, entered only after de novo review by a federal district court judge (and nothing contained herein shall be construed or otherwise deemed to be a waiver of such right by Kin

Properties or consent by Kin Properties to final adjudication in the Bankruptcy Court of such matters); (b) the rights of Kin Properties to have the reference withdrawn by the federal district court in any matter subject to mandatory or discretionual withdrawal; (c) the rights of Kin Properties to trial by jury in any proceeding so triable herein or in any case, controversy, or proceeding related hereto; (d) any objection to the jurisdiction of this Bankruptcy Court for any purpose other than with respect to this Notice; (e) an election of remedy; or (f) any other rights, claims, actions, defenses, setoffs, or recoupments to which Kin Properties is or may be entitled under any agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: November 11, 2024

**BAYARD, P.A.**

/s/ Ericka F. Johnson

Ericka F. Johnson (DE Bar No. 5024)  
600 N. King Street, Suite 400  
Wilmington, Delaware 19801  
Telephone: (302) 655-5000  
Email: ejohnson@bayardlaw.com

and

**TAYMAN LANE CHAVERRI LLP**

Jeffrey Rhodes (*pro hac vice* application pending)  
2001 L Street, NW, Suite 500  
Washington, DC 20036  
Email: jrhodes@tlclawfirm.com

*Counsel for Kin Properties, Inc., Jefan LLC, Aberdeen Oklahoma Associates, Pasan LLC, Esan LLC, Fundamentals Company LLC, Muffrey LLC, Fundamentals Company, Kinpark Associates, Laurie Industries Inc., Alisan Trust, Diajeff Trust, Stowsan Limited Partnership, Esue LLC, Alisan LLC, and Roseff LLC*